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Attorneys for United States of America

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 16-508 EMC

Plaintiff,

1

KRISHA VIRAMONTES.

Defendant

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UNITED STATES OF AMERICA

Plaintiff

V

CHRISTOPHER KINNEY

Defendant

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STIPULATED PROTECTIVE ORDER

STAFF CERTIFIED PROSECUTOR

Case No. CR 16-531 EMC

STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Criminal Procedure 16(d) and 18 U.S.C. § 1835, the United States of America (“the government”), Defendant Krishna Viramontes, Defendant Christopher Kinney, and defense counsel, hereby stipulate to the following, and the Court therefore orders:

1. The government shall provide defense counsel a copy of materials received from Dropbox Inc., which materials may include suspected trade secrets and/or confidential and proprietary information (“the Materials”). Material provided according to this Protective Order will be labeled as “PROTECTED MATERIALS.”

2. Defense counsel and their staff (“the Defense”) and Defendants shall maintain the Materials, including any copies the Defense makes, as follows:

a. The Defense and Defendants shall use the Materials solely and exclusively in connection with this case (including investigation, trial preparation, trial, and appeal), and not for any commercial or other purpose.

b. Copies of the Materials shall be maintained by the Defense at their law offices in a locked room.

c. A copy of this protective order shall be kept with the copies of the Materials at all times.

d. The only people who may view the Materials are the Defense and Defendants. Defendants may access and view the Materials solely in the presence of counsel and under the direct supervision and control of counsel. Any notes Defendants may take regarding the Materials must be maintained by the Defense.

e. In no event shall the Defense or Defendants disclose or describe any of the Materials to any other person or entity other than the government, Dropbox, Inc., or this Court. Should the Defense or Defendants need to disclose or describe any of the Materials to this Court, it shall do so under seal. Should the Defense or Defendants need to disclose or describe any of the Materials to any other court or during any other legal proceedings, it shall do so only with notice to the government and after gaining permission from this Court.

1 3. Defense counsel shall promptly notify the government and this Court if any Materials are
2 disclosed to anyone not designated by this Order or further order of the Court, either intentionally or
3 unintentionally. Defendants shall promptly notify defense counsel of any such disclosures.

4 4. At the end of these proceedings, Defendants and the Defense shall return the Materials
5 and any copies to the government. Defense counsel may retain or destroy any notes made by
6 Defendants or the Defense.

7
8 IT IS SO STIPULATED.

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10 DATED: August 21, 2017

11 BRIAN J. STRETCH
United States Attorney

12 _____
13 /s/
14 KAREN KREUZKAMP
15 Assistant United States Attorney

16 DATED: August 21, 2017

17 _____
18 /s/
19 GEOFFREY HANSEN
20 Counsel for Defendant
21 Krisha Viramontes

22 DATED: August 21, 2017

23 _____
24 /s/
25 GAIL SHIFMAN
26 Counsel for Defendant
27 Christopher Kinney

28 IT IS SO ORDERED.

29 DATED: August 22, 2017

30 HON. EDWARD
31 United States Dis

32 STIPULATED PROTECTIVE ORDER
33 Case No. CR 16-508 EMC
34 Case No. CR 16-531 EMC

